

**IN THE UNITED STATES BANKRUPTCY COURT**  
**FOR THE SOUTHERN DISTRICT OF TEXAS**  
**HOUSTON DIVISION**

<b>IN RE:</b>	§	CASE NO. 24-10120-smr
	§	
<b>TEXAS REIT, LLC</b>	§	<b>ADVERSARY PROCEEDING</b>
	§	
<b>Debtor</b>	§	<b>NO. _____</b>

**REMOVAL FROM: CAUSE NO. 2012-27197-D**

MOKARAM LATIF WEST	§	
LOOP, LTD.,	§	IN THE DISTRICT COURT F
	§	
Plaintiff,	§	
vs.	§	
	§	
ALI CHOUDHRI and	§	
ANGEL VALLE,	§	
	§	HARRIS COUNTY, T E X A S
Defendants,	§	
vs.	§	
	§	
ALI MOKARAM,	§	
	§	
Intervenor.	§	333 <sup>rd</sup> JUDICIAL DISTRICT

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**NOTICE OF REMOVAL OF CIVIL ACTION**  
**PURSUANT TO 28 U.S.C. §§ 1334 AND 1452**

**To the Honorable United States Bankruptcy Judge:**

NOW COMES ALI CHOUDHRI and file this Notice of Removal of Civil Action Pursuant to 28 U.S.C. §§ 1334 and 1452, (the "Removal Petition") under the provisions of 28 U.S.C. §§ 1334 AND 1452, AND Rule 9027 of the Bankruptcy Rules.

ALI CHOUDHRI anticipates promptly filing a motion to transfer this case to the United States Bankruptcy Court for the Western District of Texas, Austin Division, where Texas REIT, LLC's ("Defendant" or "Debtor") chapter 11 bankruptcy is pending. ALI CHOUDHRI would show as follows:

1. This removal involves a civil action that was commenced in 2012 in the 333<sup>rd</sup> Judicial District Court of Harris County, Texas in Cause No. 2012-27197, styled MOKARAM-LATIF WEST LOOP, LTD. and OSAMA ABDULLATIF, Plaintiffs v. ALI CHOUDHRI ET AL, Defendants. ("State Court Action") An index of the state court file and a copy of the state court file will be filed herein but cannot be attached to this notice due to its size. The state court case has been pending for 12 years and the file has thousands of pages. The undersigned counsel intends to contact the Harris County District Clerk on July 29, 2024 to arrange orderly mechanics of obtaining a digital copy of the state court filing.
2. Venue of this removal action is appropriate in that the proceeding is being removed from the 333<sup>rd</sup> Judicial District Court of Harris County, Texas which is located in the Southern District of Texas.
3. The State Court Action may be removed to this Court pursuant to the provisions of 28 U.S.C. §§ 1334 and 1452(a), because the causes of action arise under Title 11, arise in or are related to a case under Title 11. This matter is a core proceeding pursuant to 28 U.S.C. 157.
4. This notice of removal is filed within thirty (30) days of the July 18, 2024 order granting stay relief by approving the Motion for Reconsideration of New Trial Regarding the Court's Order Granting WCW Houston Properties, LLC's Motion from the Automatic

Stay that precluded proceeding with claims, and therefore, is timely filed pursuant to the provisions of Rule 9027 of the Bankruptcy Rules. In addition, the claim or cause of action was not “asserted in another court after the commencement of a case under the Code.” Rule 9027(3).

14. Promptly after filing of this Removal Petition, pursuant to Rule 9027(c) of the Bankruptcy Rules, ALI CHOUDHRI will file a Notice to State Court of Removal with the 333<sup>rd</sup> Judicial District Court of Harris County, Texas in Causes No. 2012-27197-A and 201227197-B.

15. ALI CHOUDHRI expressly states that they consent to the entry of a final judgment by the bankruptcy judge in this proceeding if it is determined that the bankruptcy judge, absent consent of the parties, cannot enter into final orders of judgment consistent with Article III of the United States of Constitution.

16. All Defendants have been served with process. The names and address of parties of record in this matter are as follows:

ALI CHOUDHRI  
C/O FINIS COWAN  
One Greenway Plaza, Suite 100  
Houston TX 77046

MOKARAM-LATIF WEST LOOP, LTD.  
2500 W. Loop S. Suite 450  
Houston TX 77027

OSAMA ABDULLAT  
5177 Richmond Ave., Suite 522  
Houston TX 77056

ALI MOKARAM  
2500 W. Loop S.  
Suite 450  
Houston TX 77027

ANGEL VALLE

12126 Mulholland Dr  
Stafford, TX 77447

Respectfully submitted,

COWAN LAW FIRM

/s/ Finis Cowan

Finis Cowan

State Bar No. 04912100

One Greenway Plaza, Suite 100

Houston TX 77046

(832)341-4599

Fax 713.561.3692

Email: [Finis@FinisCowan.com](mailto:Finis@FinisCowan.com)

E-service: [Service@TexasDebtDefense.com](mailto:Service@TexasDebtDefense.com)

Attorneys for Defendants

#### CERTIFICATE OF SERVICE

I hereby certify that on July 28, 2024, a true and correct copy of this pleading was served on each attorney of record or party in accordance with the Bankruptcy Rules of Procedure via e-filing and mail.

/s/ Finis Cowan